

Comments from Johnson County KS  
Re FCC NPRM 07-85  
Amendment of Part 90 of the Commission's Rules, WP Docket No. 07-100

In paragraphs 4-6 of NPRM 07-85, the FCC requests comments on several aspects of paging on public safety VHF frequencies. We wish to offer comments on the last sentence of Paragraph 6, which reads "Finally, we ask whether we should eliminate paging operations in the VHF public safety frequencies altogether."

Johnson County is a suburban county in the Kansas City metropolitan area. The county is approximately 476 square miles in size, with a population approaching 540,000. A countywide communications center provides dispatching services for the fourteen fire and EMS agencies in the county.

The fire and EMS services in our area depend heavily on tone-voice paging to alert emergency personnel of calls to which they should respond. Tone-voice paging (where the paging tones are followed by a voice announcement with the details of the emergency) is a highly reliable alerting method for emergency vehicle crews. It is a relatively inexpensive option since it involves no wired connections with monthly recurring charges. It is not susceptible to the "backhoe fade" that occurs when an excavation crew accidentally cuts the wired connection to a station. It works equally well whether the emergency vehicle is in or out of its station. It is especially effective for alerting off-duty and volunteer personnel, since they can be alerted anywhere within the coverage area of the radio system.

While we understand the concerns of the Commission with regard to high-volume paging on shared channels, we urge the Commission not to eliminate or significantly restrict tone-voice paging on frequencies licensed to a single public-safety entity within a given area. Finding another alerting option that is as reliable, timely and cost-effective will be impossible in many cases.

Thank you for the opportunity to comment on this important docket.